ANDREA BEATTY RINIKER
Director

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
4350 - 150th Ave. N.E. • Redmond, Washington 98052-5301 • (206) 885-1900

January 7, 1986

CERTIFIED MAIL

Mr. David Sidell
Seattle Iron & Metals Corporation
2955 - 11th Avenue S.W.
Seattle, Washington 98134

Joint Inspection With Ecology, EPA and METRO
At Seattle Iron & Metal Corporation
Seattle, Washington on December 10, 1985.

Dear Mr. Sidell:

Mr. Dan Tangarone and Mr. Jim Pankanin, Inspectors for the U.S. Environmental Protection Agency (EPA) Region 10 Office in Seattle; and Tim Sample and Ray Carveth, Inspectors for the Municipality of Metropolitan Seattle (METRO); and Dan Cargill and I met with you in your office at your facility on December 10, 1985. EPA and Ecology staff then conducted an inspection and took photographs of your facility. Thank you for your cooperation during that inspection. Please read this letter carefully and then implement measures to bring your facility into compliance with state water quality control regulations and laws.

The inspection began at the gate by the scale in the southeast corner of the main lot and circled the lot clockwise to end back in front of the office. During the inspection we were informed that the batteries were stored outdoors, just inside the gate, prior to shipment. The batteries we saw and photographed were stored on broken pallets on an unbermed asphalt surface. I strongly recommend that you either store batteries indoors or on a bermed concrete surface with cover. RCW 90.48 forbids any discharge of pollutants such as battery acid or lead, to state waters, which include surface and ground waters.

The next area of concern was the storage area for containers full of copper ash. The containers were stored directly on deteriorated asphalt and had no lids or cover. The high metals content of the ash constitutes a threat to the waters of the state, therefore we expect to receive the following from you:

1. Within ten (10) days of the receipt of this letter;

   a. All available analytical data from metal analysis of the ash;

   b. Written certification from you tha the containers of ash have been, at a minimum, covered with a continuous sheet of plastic.

2. Within thirty (30) days of the receipt of this letter, the results of Extraction Procedure (EP) Toxicity Test Analysis (in accordance with WAC 173-303-110) on samples from five (5) containers of the ash. The EP Toxicity test must be conducted for the following metals:

   Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver, Copper, Nickel, and Zinc.

The next area of concern was the copper rinse area. Under WAC 173-220, the National Pollutant Discharge Elimination System Permit Program, Group I discharges, which are industrial plant associated areas, are required to submit forms 1 and 2c. Within 30 days of the receipt of this letter we expect to receive these completed forms from you for this area.

Based on information from the recent clean up of PCB contaminated soil at the Purdy Company Facility, which also accepted transformers and capacitors, we feel an investigation of your facility is warranted. Therefore, within 30 days of the receipt of this letter we expect to receive from you all data from 1979, to date regarding:

A) Sources of transformers and capacitor purchases, including size of items, operational use of material, dates of use and receipt.

B) Results of any analytical data on the transformer and capacitor oils.

C) A description of handling practices and locations for transformers and capacitors before and after drainage, as well as for the drained oils.

D) Transformer and capacitor oils disposal and/or recycling practices.

The next concern was the storage on the premises of several drums of products and one tank of waste oil with no cover or bermed area. I strongly recommend that you keep these drums and tank on a bermed concrete surface under a roof. RCW 90.48 forbids discharge of pollutants to state waters which include surface and ground waters.

The final area of concern was the stormwater collected in an underground tank in the north corner of the lot near 11th Avenue. Under WAC 173-220, Group II discharges are required to submit form 1 and a narrative description of their discharges. Within 30 days of the receipt of this letter we will expect to receive from you a completed form 1 for this area.

Because of the documented concerns identified above we have decided to recommend that an Administrative Order be issued to your facility to insure that state waters are adequately protected. Don't hesitate to contact us if you have further questions regarding this letter.

Sincerely,

Lee Dorigan

Lee Dorigan
District Inspector
Environmental Quality

LD:gm

cc: Phil Miller, WDOE - Olympia
Dan Cargill, WDOE - Redmond
Dan Tangerone, USEPA - Seattle
Ray Carveth, METRO

11-FEB-86
09:24:09

EPA Region X Lab Management System
*** Sample/Project Analysis Results ***

Project: TEC-263A

SEATTLE IRON AND METALS

Sample No: 85 500500 Begin Sample Date: 85/12/10 13:00 Source: Industrial Surface R

Laboratory: RX Description: MAIN STORMSEWER CATCHBASIN NEAR SMELTER

Metals-Specified Parameter		Water-Total Result	Units
Sodium	Na-Total	12.9	mg/l
Arsenic	As-Total	10	ug/l
Cadmium	Cd-Total	11	ug/l
Chromium	Cr-Total	33	ug/l
Copper	Cu-Total	7700	ug/l
Iron	Fe-Total	4920	ug/l
Lead	Pb-Total	2500	ug/l
Nickel	Ni-Total	30	ug/l
Silver	Ag-Total	1.5	ug/l
Zinc	Zn-Total	1455	ug/l
Aluminum	Al-Total	8160	ug/l

Metals - EP Toxicity Parameter		EPT-Liq Result	Units
Arsenic	As-Total	10	ug/l
Barium	Ba-Total	450	ug/l
Cadmium	Cd-Total	5	ug/l
Chromium	Cr-Total	50	ug/l
Copper	Cu-Total	254	ug/l
Lead	Pb-Total	50	ug/l
Nickel	Ni-Total	4	ug/l
Silver	Ag-Total	0.10	ug/l
Zinc	Zn-Total	208	ug/l

Project: TEC-2B3A SEATTLE IRON AND METALS Officer: DRT Account: AF

Sample No: 85 500501 Begin Sample Date: 85/12/10 13:02 Source: Soil (Spill/Contamin Depth: QA Code:

Laboratory: Rx Description: MAIN STORMSEWER SEDIMENT IN VICINITY

Metals-Specified Parameter		Sediment Result	Units
CA MUD	DRY WGT	4400	MG/KG-CA
MG MUD	DRY WGT	6280	MG/KG-MG
NA MUD	DRY WGT	360	MG/KG-NA
K MUD	DRY WGT	403	MG/KG-K
Arsenic	As-Sedmt	7.7	mg/kg-dr
Ba Mud	Dry wgt	1184	mg/kg-ba
B MUD	Dry Wgt	NAK	mg/kg-B
Cadmium	Cd-Sedmt	15.4	mg/kg-dr
Chromium	Cr-Sedmt	55	mg/kg-dr
Copper	Cu-Sedmt	428.06	mg/kg-dr
Lead	Pb-Sedmt	24220	mg/kg-dr
Mn Mud	Dry wgt	373	mg/kg-Mn
Nickel	Ni-Sedmt	75.2	mg/kg-dr
Silver	Ag-Sedmt	2.2	mg/kg-dr
Zinc	Zn-Sedmt	2256	mg/kg-dr
AL MUD	DRY WGT	21400	MG/KG-AL
FE MUD	DRY WGT	23700	MG/KG-FE

Metals - EP Toxicity Parameter		EPT-Sed Result	Units
Arsenic	As-Total	10	ug/l
Barium	Ba-Total	660	ug/l
Cadmium	Cd-Total	10	ug/l
Chromium	Cr-Total	12	ug/l
Copper	Cu-Total	310	ug/l
Lead	Pb-Total	20	ug/l
Nickel	Ni-Total	10	ug/l
Silver	Ag-Total	0.10	ug/l
Zinc	Zn-Total	14	ug/l

PCB Scan Parameter		Sediment Result	Units
PCB-1260	(Arochlor 1260	11000	ug/kg — ppb 11 ppm
PCB-1254	(Arochlor 1254	2000	ug/kg
PCB-1221	(Arochlor 1221	2000	ug/kg
PCB-1232	(Arochlor 1232	2000	ug/kg
PCB-1248	(Arochlor 1248	4400	ug/kg — ppb 4.4 ppm
PCB-1016	(Arochlor 1016	2000	ug/kg
PCB-1242	(Arochlor 1242	2000	ug/kg

(Sample Complete)

Project: TEC-263A SEATTLE IRON AND METALS Officer: DRT Account: AFE

Sample No: 85 500502 Begin Sample Date: 85/12/10 13:15 Source: Soil (Spill/Contamin Depth: QA Code:

Laboratory: RX Description: ASH ALONG RAIL OF WASH DOWN TANK

Comment: HANDCARRIED 1/2 SAMPLE TO J.OSBORNE FOR DRT

Metals-Specified Parameter		Sediment Result	Units
CA MUD	DRY WGT	18250	MG/KG-CA
MG MUD	DRY WGT	10420	MG/KG-MG
NA MUD	DRY WGT	473	MG/KG-NA
K MUD	DRY WGT	415	MG/KG-K
Arsenic	As-Sedmt	8.1	mg/kg-dr
Ba Mud	Dry wgt	1921	mg/kg-Ba
B MUD	Dry wgt	NAK	mg/kg-B
Cadmium	Cd-Sedmt	17.7	mg/kg-dr
Chromium	Cr-Sedmt	110	mg/kg-dr
Copper	Cu-Sedmt	155000	mg/kg-dr
Lead	Pb-Sedmt	18040	mg/kg-dr
Mn Mud	Dry wgt	280	mg/kg-Mn
Nickel	Ni-Sedmt	75.4	mg/kg-dr
Silver	Ag-Sedmt	0.41	mg/kg-dr
Zinc	Zn-Sedmt	22200	mg/kg-dr
AL MUD	DRY WGT	29400	MG/KG-AL
FE MUD	DRY WGT	22280	MG/KG-FE

Metals - EP Toxicity Parameter		EPT-Slu Result	Units
Arsenic	As-Total	10	ug/l
Barium	Ba-Total	430	ug/l
Cadmium	Cd-Total	81	ug/l
Chromium	Cr-Total	50	ug/l
Copper	Cu-Total	1050	ug/l
Lead	Pb-Total	580	ug/l
Nickel	Ni-Total	87	ug/l
Silver	Ag-Total	0.10	ug/l
Zinc	Zn-Total	29900	ug/l

Poly Arom Hydrocrbn Parameter	Sediment Result	Units
Pyrene, Benzo[a]-	1000	ug/kg-dr
Anthracene, Dibenzo[a,h	10000	ug/kg-dr
Anthracene, Benzo[a]-	1000	ug/kg-dr
Acenaphthene	100000	ug/kg-dr
Phenanthrene	400	ug/kg-dr
Fluorene	20000	ug/kg-dr
Napthalene	70000	ug/kg-dr
Anthracene	100	ug/kg-dr
Pyrene	7000	ug/kg-dr

Poly Arom Hydrocrbn *** Continued *** Parameter	Sediment Result	Units
Perylene, Benzo[g,h,i]-	10000	ug/kg-dr
Pyrene, Indeno[1,2,3-c,	2000	ug/kg-dr
Fluoranthene, 3,4-Benzo	700	ug/kg-dr
Fluoranthene	2000	ug/kg-dr
Fluoranthene, Benzo[k]-	200	ug/kg-dr
Acenapnthylene	100000	ug/kg-dr
Chrysene	200	ug/kg-dr

PCB Scan Parameter	Sediment Result	Units
PCB-1260 (Arochlor 1260	130	ug/kg
PCB-1254 (Arochlor 1254	600	ug/kg
PCB-1221 (Arochlor 1221	600	ug/kg
PCB-1232 (Arochlor 1232	600	ug/kg
PCB-1248 (Arochlor 1248	600	ug/kg
PCB-1016 (Arochlor 1016	600	ug/kg
PCB-1242 (Arochlor 1242	600	ug/kg

.13 ppm

(Sample complete)

Project: TEC-263A SEATTLE IRON AND METALS Officer: DRT Account: AF

Sample No: 85 500503 Begin Sample Date: 85/12/10 13:30 Source: Soil (Spill/Contamin Depth: QA Code:

Laboratory: RX Description: WASTE OIL TANK VICINITY SOIL AROUND

Metals-Specified Parameter		Sediment Result	Units
CA MUD	DRY WGT	2540	MG/KG-CA
MG MUD	DRY WGT	5640	MG/KG-MG
NA MUD	DRY WGT	959	MG/KG-NA
K MUD	DRY WGT	446	MG/KG-K
Arsenic	As-Sedmt	22.5	mg/kg-dr
Ba Mud	Dry Wgt	462	mg/kg-Ba
B MUD	Dry Wgt	NAR	mg/kg-B
Cadmium	Cd-Sedmt	30.7	mg/kg-dr
Chromium	Cr-Sedmt	0.5U	mg/kg-dr
Copper	Cu-Sedmt	4900	mg/kg-dr
Lead	Pb-Sedmt	3660	mg/kg-dr
Mn Mud	Dry Wgt	451	mg/kg-Mn
Nickel	Ni-Sedmt	74.6	mg/kg-dr
Silver	Ag-Sedmt	0.14	mg/kg-dr
Zinc	Zn-Sedmt	5110	mg/kg-dr
AL MUD	DRY WGT	8880	MG/KG-AL
FE MUD	DRY WGT	60370	MG/KG-FE

Metals - EP Toxicity Parameter		EPT-Slg Result	Units
Arsenic	As-Total	5	ug/l
Barium	Ba-Total	180	ug/l
Cadmium	Cd-Total	28	ug/l
Chromium	Cr-Total	50	ug/l
Copper	Cu-Total	500	ug/l
Lead	Pb-Total	66	ug/l
Nickel	Ni-Total	30	ug/l
Silver	Ag-Total	0.1U	ug/l
Zinc	Zn-Total	3270	ug/l

PCB Scan Parameter		Sediment Result	Units
PCB-1260	(Arochlor 1260	19000	ug/kg
PCB-1254	(Arochlor 1254	14000U	ug/kg
PCB-1221	(Arochlor 1221	14000U	ug/kg
PCB-1232	(Arochlor 1232	14000U	ug/kg
PCB-1248	(Arochlor 1248	13700	ug/kg
PCB-1016	(Arochlor 1016	14000U	ug/kg
PCB-1242	(Arochlor 1242	14000U	ug/kg

19
13.7
32.7 ppm

(Sample Complete)